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99-125

Adams Communications Corporation

Exhibits 44 - 48:  
Transcripts of  
Local Public Witness Depositions

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UNITED STATES OF AMERICA  
FEDERAL COMMUNICATIONS COMMISSION

-----X  
In re Applications of :  
:   
:   
:   
READING BROADCASTING, : MM Docket No. 99-153  
INCORPORATED, : File No. BRCT-94047KF  
: File No. BPCT-940630KG  
ADAMS COMMUNICATIONS :  
CORPORATION. :  
-----X

Washington, D.C.

Friday, March 10, 2000

Deposition of

JOHN LOOS

a witness, called for examination by counsel  
for Adams Communications Corporation (ACC)  
pursuant to notice and agreement of counsel,  
beginning at approximately 9:50 a.m., at the  
law offices of Bechtel & Cole, 1901 L Street,  
N.W., Washington, D.C., before Jonell Easton  
of Beta Reporting & Videography Services,  
notary public in and for the District of  
Columbia, when were present on behalf of the  
respective parties:

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**BETA**

## 1 APPEARANCES:

2 On behalf of ACC:

3 HARRY R. COLE, ESQUIRE  
4 Bechtel & Cole, Chartered  
5 1901 L Street, N.W., Suite 250  
Washington, D.C. 20036  
(202) 833-3084

6 On behalf of Reading Broadcasting, Inc., (RBI):

7 THOMAS J. HUTTON, ESQUIRE  
8 C. DENNIS SOUTHARD IV, ESQUIRE  
Holland & Knight, L.L.P.  
9 2100 Pennsylvania Avenue, N.W., Suite 400  
Washington, D.C. 20037  
10 (202) 955-3000

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## C O N T E N T S

| EXAMINATION BY:            | PAGE |
|----------------------------|------|
| Counsel for ACC            | 4    |
| Counsel for RBI            | 29   |
| LOOS DEPOSITION EXHIBITS:  |      |
| No. 1 - Newspaper Articles | 12   |
| No. 2 - Newspaper Articles | 17   |

\* \* \* \* \*

## P R O C E E D I N G S

Whereupon,

JOHN LOOS

was called as a witness and, having been  
first duly sworn was examined and testified  
as follows:

EXAMINATION BY COUNSEL FOR ACC

BY MR. COLE:

Q State your name and home or office  
address for the record.

A John Loos, and it is 1238 Hunting  
Well Road, Leesport, Pennsylvania 195334.

Q You are appearing at the deposition  
today pursuant to notice of deposition and  
subpoena that were sent to your by Adams  
Communications Corporation. Correct?

A Yes.

Q My name is Harry Cole. We have  
talked by phone. I represent Adams  
Communications Corporation.

Also in the room in Washington,  
D.C. in addition to the court reporter is

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1 Mr. Hutton, who represents Reading Broadcast  
2 station, Channel 51 in Reading.

3 I will be asking you questions and  
4 Mr. Hutton may ask you questions. If you  
5 need clarification, let us know. We will  
6 stop and get you straightened out before we  
7 proceed. Is that okay?

8 A Fine.

9 Q I understand that you are  
10 short-staffed in reading and that it is  
11 entirely possible you may have to excuse  
12 yourself and take your call. In that  
13 instance, we will go off the record.

14 When you come back, if you say you  
15 are back, we will go back on the record.

16 A Fine.

17 Q I guess the record should reflect  
18 that present is James Donofrio, who is local  
19 counsel for Adams in the Reading area.

20 We understand that Frank McCracken,  
21 a representative of Reading Broadcasting, may  
22 show up. We welcome in Mr. McCracken if he

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1 does show up. Please note his arrival.

2 A Okay.

3 Q What is your current employment  
4 position?

5 A Emergency management coordinator  
6 for Burke County.

7 Q How long have you been in that  
8 post?

9 A Approximately seven years.

10 Q From 1993?

11 A Correct, I believe it began late  
12 fall of '92.

13 Q Is that an elected position or  
14 appointed?

15 A Appointed.

16 Q Who appointed you?

17 A Initially, the commissioner of  
18 Burke county and under the law you have to be  
19 appointed by the governor.

20 Q That has been done?

21 A Correct.

22 Q So you are legal?

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1 A As far as we know.

2 Q Do you reside in the Reading area?

3 A Yes.

4 Q For how long?

5 A In Burke County, now about 14  
6 years.

7 Q You are emergency management  
8 coordinator. Is there an office called  
9 office of management or emergency management  
10 agency?

11 A Correct.

12 Q Is that a county agency?

13 A Yes.

14 Q Your position is head of that  
15 agency?

16 A It is as the coordinator, which  
17 means I coordinate the responses and recovery  
18 that would happen under emergency management.

19 Q Describe the function of the  
20 agency?

21 A Primarily it is to handle response  
22 and recovery and any type of disasters in the

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1 county.

2 Those could be natural, such as  
3 snow, earthquake or flood or manmade, such a  
4 nuclear power and/or hazardous materials  
5 accident.

6 Q When you say "response and  
7 recovery," give me an idea of what that  
8 means.

9 A Initial response would be like  
10 police fire, and ambulance.

11 This agency gets involved in  
12 coordinating at the scene and helping with  
13 any type of resource, Red Cross or Salvation  
14 Army or the county and state and federal  
15 government.

16 Recovery would be the period after  
17 initial response, and that may go into effect  
18 either through state and federal government.

19 Q For instance, getting disaster aid  
20 for rebuilding destroyed buildings?

21 A Correct.

22 Q What do you personally do as

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1 coordinator?

2           A     As coordinator, I would coordinate  
3 resources and such, help local people that  
4 have been affected and work with local  
5 municipal agencies, local government. We  
6 would help with any type of resource we  
7 could. I would help coordinate that.

8           Q     As coordinator, do you have  
9 occasion to have contact or communications  
10 with broadcast stations concerning local  
11 emergencies in the Burke County area?

12          A     I do have contact with stations.

13          Q     Describe generally how those occur.

14          A     Usually, I guess, two types of  
15 whatever -- I might be in contact, one, in  
16 the case of an emergency, we might use what  
17 is referred to as an emergency alert. That  
18 is handled by two radio stations in the  
19 county. One is primary, WRFY 102.5 am, and  
20 that is backed up with EEU you 830 am.

21                     If there is some of type incident  
22 and you want to get information out, one of

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1 the best ways is through the emergency alert  
2 system we could contact radio and set up  
3 tones and put emergency information out.

4 That is usually how we would  
5 contact local station for emergency  
6 information to be put out to the general  
7 public.

8 The other way is to, by them  
9 contacting us. Normally, in any type of  
10 weather emergency, those warnings are put out  
11 by the National Weather Service and the radio  
12 and television handles those by putting them  
13 out to the general public.

14 Over the years of this department  
15 getting information -- and there may be  
16 federal money -- radio stations or TV have  
17 contacted this office to find out what we are  
18 doing to prepare or what we have done during  
19 it or what happened after, those types of  
20 things, normally it is us being contacted by  
21 those stations for information.

22 Q Mr. Loos, a couple of days ago I

1 sent you a packet of materials which consists  
2 largely of, really eclectic issues. Do you  
3 have that in front of you?

4 A Yes.

5 Q I am handing one that is similar to  
6 the court reporter and Mr. Hutton here so we  
7 can all read from the same universe of  
8 documents.

9 You have to find the Reading Eagle  
10 for Friday March 12, 1993. It has a large  
11 headline line, March blizzard?

12 A I have that.

13 Q I will refer to that page following  
14 and the following page March 13, Monster  
15 Blizzard. Do you see that?

16 A Yes.

17 Q Second page, County Says No To  
18 Snow?

19 A Yes.

20 Q Next page should be March 14, 1997  
21 Blizzard Pounds Region.

22 A Yes.

1           Q     Should be a second page to that  
2 which only have a weather across upper third  
3 and skips from that article that would on  
4 page 1 and is carried over.

5           A     Right.

6           Q     Next page should be March 14, 1997  
7 in Burke and beyond, section C of the paper,  
8 top headline, Biggest Blizzard, Time will  
9 tell. Do you have those in front of you?

10          A     Yes.

11               MR. COLE: Review those briefly. I  
12 have a couple questions.

13               While you are looking, I will mark  
14 those materials and ask her to mark that as  
15 Exhibit 1.

16               THE WITNESS: Okay.

17               (Loos Deposition Exhibit No. 1  
18 was marked for identification.)

19               BY MR. COLE:

20           Q     Let us know when you have reviewed  
21 that. Take your time.

22           A     I have looked them over.

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1 Q Do you recall that blizzard?

2 A Yes.

3 Q Was that a blizzard that  
4 constituted a local emergency that involved  
5 your agency?

6 A Yes, it constituted a local  
7 emergency. We opened partial emergency  
8 operation. We brought people out to answer  
9 the phone. Yes, that type of thing.

10 Q In this particular situation, do  
11 you recall were there lot of phone calls into  
12 the emergency room you set up?

13 A There was a number that was -- this  
14 was my first incident, so to speak -- nothing  
15 happened prior to this.

16 This was my first time with a  
17 larger scale emergency. We did receive a  
18 number of phone calls. There were a lot of  
19 ambulances or fire trucks that couldn't get  
20 through.

21 I believe there one incident where  
22 a little girl was having difficulty

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1 breathing. We had to get a ambulance in to  
2 take her all the way to the hospital.

3 Q As far as you can tell, are the  
4 news coverage of blizzard, is that, within  
5 reason, a fair accounting of what happened as  
6 far as the storm?

7 A Yes, it is.

8 Q Do you have recollection of any  
9 contacts between you or your agency and  
10 Channel 51 at the time of the this blizzard  
11 in March of '93 concerning any over-the-air  
12 provision of information about the blizzard  
13 to stations, to viewers?

14 THE WITNESS: I apologize. The  
15 phone is ringing.

16 MR. COLE: No problem. Off the  
17 record.

18 (Recess)

19 BY MR. COLE:

20 Q Back on the record. Do you  
21 remember my question?

22 A I believe I remember it. I don't

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1 specifically remember having contact with  
2 Channel 51 at that time, no.

3 Q Move on to the next page of the  
4 newspaper articles, July 16, 1993, Death of  
5 City Man Is Probed. It is the B section.

6 A Yes.

7 Q Under that is an article about  
8 downtown a gas line that ruptured?

9 A Yes.

10 Q Would that have been an incident  
11 which would have triggered some response by  
12 your agency?

13 A I don't remember that one. We  
14 usually get notified of those types of  
15 situations only if a large area would be  
16 effected. Then, we would assist with the Red  
17 Cross.

18 Q You don't recall this?

19 A No, I don't recall.

20 Q Move on to the next one,  
21 January 18, 1994, 33 dead from quake.

22 A Yes.

1           Q       There should follow from that one a  
2 total of 11 pages left and the first page is  
3 January 18, 1994, page 1, with lead article  
4 about Los Angeles quake, page 2, State  
5 Federal Aid Unlikely.

6                   Three, main, January 18 Burke  
7 blanketed again, page 4, January 19 lead  
8 article is Casey Asks Businesses to Shut  
9 Down.

10                   Page after that, the lead article,  
11 Water Main Break.

12                   Next page is January 19, 1994, lead  
13 article is Roofs Cave-in Under Weight of Snow  
14 and Ice.

15                   Next page lead article, Gas Burns  
16 City Man.

17                   Next page, Temperatures Rise But  
18 Not Much.

19           A       Yes.

20           Q       Page after that has no big lead,  
21 but in the upper right customers help mail to  
22 through?

1 A Yes.

2 Q January 14, 1994, Gas Main Closed  
3 After the Blast?

4 A Yes.

5 Q Are you working from the same set  
6 of articles?

7 A Yes.

8 MR. COLE: Let's mark this next  
9 exhibit, please.

10 (Loos Deposition Exhibit No. 2  
11 was marked for identification.)

12 BY MR. COLE:

13 Q Let me ask you a couple questions  
14 about this. With respect to the first page  
15 after Shocks Rock Burke, do you see that?

16 A Yes.

17 Q Do you recall that an earthquake  
18 occurred in Reading in January of 1994?

19 A Yes.

20 Q Could you describe that quake.

21 A I apologize. I don't remember the  
22 date. I believe it was Saturday night before

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1 the 14 or 15 that it hit. There were two  
2 initial shocks. The larger one was  
3 approximately an hour later. That affected  
4 large portions of the western part of the  
5 county.

6 Q Are earthquakes in Reading common?

7 A Not that I was aware of, no. There  
8 have been some -- in looking at articles back  
9 in the '50s in certain areas and that area  
10 that was affected has had rumblings in the  
11 past.

12 We are susceptible because there  
13 are a lot of underground caverns. As a  
14 result, we get some earthquakes when there  
15 has been lots of water movement. That may  
16 play a part. We may have more.

17 Q Was the January of 1994 earthquake  
18 more or less powerful as far as your  
19 earthquake experience?

20 A From what we have determined, that  
21 was the largest ever in the area and one of  
22 the largest on the east coast.

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1           Q     Is it safe to say that triggered  
2 activities by your agency?

3           A     Yes, we set the emergency order.  
4 It happened later in the evening, so it was  
5 dark.

6                     There was not a lot of damage such  
7 as you would normally see. We had no houses  
8 totally destroyed.

9                     There was also ice and snow  
10 covering the ground. A lot was not seen  
11 until the next day.

12           Q     There were two shocks Saturday  
13 night, as I read this article.

14                     It appears there were some after  
15 shocks in the county, according to the first  
16 paragraph, on the following Monday.

17           A     Correct, and they continued for  
18 months and months.

19           Q     Did those cause public concern that  
20 was brought to your concern as head of the  
21 agency?

22           A     The after shocks?

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1 Q Yes.

2 A Yes, for several reasons, people  
3 were nervous and concerned it would happen  
4 again. We were trying to keep a record  
5 because we had contacted Millersville  
6 University to see where the fault line was.  
7 Lancaster County had some of the same  
8 problems.

9 Q Do you recall whether you invoked  
10 emergency broadcast system or the alert  
11 system?

12 A Yes. I apologize. I have to  
13 answer a phone.

14 MR. COLE: Off the record.

15 (Discussion off the record)

16 BY MR. COLE:

17 Q Do you recall whether it triggered  
18 or invoked the emergency broadcast system or  
19 emergency alert system in connection with the  
20 earthquake?

21 A Yes, there was an emergency  
22 broadcast we did from the standpoint of

ADAMS COMM. CORP.  
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1 talking to the head of county communications  
2 or the 911 center.

3 That center was locked up because  
4 everybody in the county was on their phone  
5 trying to figure out what was happening.

6 I contacted WRFY and asked them to  
7 set off tones and contact other stations to  
8 put on information asking people to stay off  
9 the phones and advised them there had been an  
10 earthquake. I believe it was measured 4.6.

11 We asked unless they had a true  
12 emergency to stay off the phones and stay  
13 tuned to the local news media for more  
14 information.

15 Q Do you have recollection of any  
16 contacts between you and other  
17 representatives of the agency with station  
18 WTVE at the time of earthquake concerning  
19 other information?

20 A Not referring to the emergency  
21 broadcast system.

22 Q No contacts between the agency and

1 station concerning any information which the  
2 station might then broadcast about the  
3 earthquake?

4 A The reason I hesitate is because I  
5 don't recall specifically. There was contact  
6 from a young lady at Channel 51. I don't  
7 remember her name.

8 I don't remember whether it was  
9 during the time of the earthquake or whether  
10 of subsequent to the '96 blizzard. I  
11 apologize.

12 Q The '96 blizzard?

13 A Yes, I don't remember. I have a  
14 hard time remembering what I had for  
15 breakfast.

16 It was either the earthquake or  
17 blizzard in '96. I am leaning to the  
18 earthquake. I don't remember.

19 The context -- they were doing  
20 short spots on public safety. I know in  
21 talking to a friend at the Red Cross they had  
22 done programs at Channel 51, a few spots

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1 talking about safety and things you could do.

2 I don't remember whether it was the  
3 earthquake or next blizzard or whether it was  
4 during that timeframe.

5 I do remember talking to her and  
6 trying to set up a time to go to the station  
7 and do a program.

8 However, there was never any done.  
9 I know for a fact at least one time I got  
10 called and we were not able to come up to a  
11 with a date for their broadcast time.

12 Q So nothing ever came of those  
13 contacts? Am I understanding you correctly?

14 A Nothing, I never went and did a  
15 program.

16 Q Right. All right. Moving along go  
17 to the next page, I'm sorry, page 3, Burke  
18 Blanketed, February 18, 1994. Am I correct  
19 in Reading this and subsequent pages that  
20 immediately after the earthquake there was  
21 then a fairly substantial blizzard in Reading  
22 and Burke County?

1           A       There were during '94, my  
2 recollection there were a number of different  
3 snow storms, snow and ice and a break and  
4 snow and ice. That continued for several  
5 weeks after the actual earthquake.

6           Q       So you do recall the snow storms  
7 that came in that are described in those  
8 pages you have in front of you. Correct?

9           A       Yes.

10          Q       If you could, please describe  
11 briefly a little more detail about the nature  
12 of the storms that followed the earthquake.

13          A       There were a number -- first an  
14 extremely cold time period when the  
15 earthquake hit and subsequent weeks after.

16                 As I remember, it was extremely  
17 cold. We had a number of different things  
18 happen not only earthquake and trying to find  
19 out whether there would be federal funding.

20                 We were lucky nobody was hurt, so  
21 the response was a little limited. There was  
22 a subsequent large water main break right

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1 around the area of the earthquake that  
2 affected a few thousand people as far as  
3 water.

4 So I was asked to help coordinate  
5 between the City of Reading and a number of  
6 municipalities because there was going to be  
7 a large period of time before that main would  
8 be fixed.

9 There was a huge sink hole.

10 Q Is that page 2 of January 19,  
11 Rationing of Water is Ordered?

12 A Correct.

13 Q Following page, wait, Water Main  
14 Breaks Severing Service to Community?

15 A Yes.

16 Q Is it also safe to assume this  
17 series of events, including a blizzard and  
18 water main break, also triggered involvement  
19 by your agency?

20 A Correct, like from a resource  
21 standpoint we were working to get bottled  
22 water to get a tank into the area for water,

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1 working closely with various organizations to  
2 try establish, there had been small water  
3 lines that hadn't been used for a period of  
4 time. We worked to help to coordinate, to  
5 reopen those lines, worked with the City of  
6 Reading Water Authority to reopen those  
7 lines.

8 Q Next page, Roofs Cave in?

9 A Yes.

10 Q Page after Gas Blast Burns City  
11 Man, was there link associated with police?

12 A I don't remember that, no.

13 Q Would not have been an incident  
14 that would have triggered your involvement?

15 A We knew it was only there was  
16 nothing this agency had to do.

17 Q Following page, Temperatures Rise  
18 Not Much. Do you see that?

19 A Yes.

20 Q As I read it, there was apparently  
21 a problem with the deliver of electrical  
22 service apparently related to the storm.

1 Am I reading correctly?

2 A Yes, 1994 was a hell of a year.  
3 Sometimes we had brown-outs or black-outs,  
4 rolling black-outs where between the weather  
5 and huge consumption of electricity because  
6 of cold weather, local use at this time the  
7 county was having to have rolling black-outs  
8 to conserve electricity because of  
9 anticipated shortages and large consumption.  
10 We had to close down to help conserve.

11 Q Would emergency management agency  
12 be involved as coordinators?

13 A No, that was strictly MedEd. We  
14 did get involved because there was times,  
15 there was no real coordination. You never  
16 knew who lost electricity.

17 So there were new meetings trying  
18 to coordinate, trying to find out where the  
19 areas were going to be, so we could alert  
20 people.

21 Q Mr. Loos, do you have any  
22 recollection of any contacts between you and

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1 station WTVE at the time of the '94 blizzard  
2 concerning the provision of information about  
3 that blizzard to station viewers, over the  
4 station's air waves?

5 A Only contact as I explained, I ever  
6 had with Channel 51 was a young lady trying  
7 to set up for me to do a short program.

8 I don't remember whether it was '94  
9 or a subsequent blizzard. I believe it was  
10 the '94 time. I am not sure. That was the  
11 only contact I had with Channel 51.

12 Q Do you have any recollection as to  
13 whether during '89 to '94, I realize you have  
14 testified you have been a resident during  
15 that entire peed?

16 A Yes since like '86, yeah.

17 Q Do you have any personal  
18 recollection as to whether or not during '89  
19 to '94 station WTVE provided any other air  
20 coverage with respect to any local emergency?

21 A Personally I do not. I will be up  
22 front and tell you I am not a huge TV

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1 watcher. Normally the station would have  
2 been stations that would have contacted us.  
3 I would have watched them.

4 Q Other than the one contact with the  
5 lady from WTVE there were no other contacts?

6 MR. HUTTON: Objection. That  
7 mischaracterizes. He said there were a  
8 series.

9 THE WITNESS: There were a few  
10 contacts. I can tell you there were a  
11 couple, not just one trying set up a time.

12 Unfortunately, we were not able to  
13 set up a time.

14 MR. COLE: I have no further  
15 questions.

16 EXAMINATION BY COUNSEL FOR RBI

17 BY MR. HUTTON:

18 Q I am Tom Hutton. I represent  
19 Reading Broadcasting.

20 I want go back to your testimony  
21 about the emergency alert system previous  
22 known as the emergency broadcasting system?

1           A     Right.

2           Q     I take it your agency issued alerts  
3 to two lead radio stations, WEEU and RFY?

4           A     Correct, RFY is the primary station  
5 we go through first, then we would go to  
6 WEEU.

7           Q     Whichever station takes the lead in  
8 receiving the alert from your office, what do  
9 they do?

10          A     The way the system works is that an  
11 alert can be set out by the National Weather  
12 Service, from the county agency. At that  
13 time there were specific code words.

14                In other words, if I call the radio  
15 station and say, I need this to be put out.

16                You couldn't do that without  
17 knowing the code word.

18                I would say this is John Loos.  
19 They would know it is me and put it out.  
20 They would normally tape myself making a  
21 statement. Or they would tape it.

22                They set off those tones you hear.

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1 They play that tape giving emergency  
2 information.

3 The tone sets off an alert other  
4 stations involved in the emergency broadcast  
5 system. That message is coming across and  
6 they have to play that message.

7 Q So the fact WTVE was not one of the  
8 two stations you dealt with directly doesn't  
9 mean they didn't carry warnings?

10 A I am not sure Channel 51 was in  
11 that series.

12 In other words, it is normally  
13 picked by, in this area picked by cable copy  
14 companies, various radio stations not just  
15 two, some others in the county.

16 I am not positive that Channel 51  
17 is on that. Something is done making  
18 someone -- it is a voluntary thing to be a  
19 part of that program.

20 Q We have program a log from WTE in  
21 the record. I think it will show they do  
22 participated.

1           A     Off the top of my head, I don't  
2 remember.

3           Q     With respect to the earthquake, I  
4 am looking at Exhibit 2. Specifically I am  
5 looking at the bottom right, page 38.

6                     Do you see that page. At the top?

7           A     I have it.

8           Q     It says, State Federal Said  
9 Unlikely Burke Earthquake Damage Too Slight  
10 To Qualify.

11          A     Okay.

12          Q     It sounded to me, from your  
13 testimony, there was no property damage and  
14 nobody was hurt in that earthquake. Is that  
15 right?

16          A     There were no injuries. That is  
17 correct. Property damage -- there was  
18 extensive property damage, but we had no  
19 homes destroyed. I was trying to get across  
20 that you are used to seeing earthquake in  
21 California with nothing left.

22                     We had damage to hundreds and

1 hundreds of homes. Primarily it was inside  
2 where basement walls had cracks that were not  
3 there before.

4 Walls in many houses would have  
5 cracks. We had a lot of furniture and  
6 various things on walls that fell off.

7 I don't remember the actual damage  
8 figure from that incident itself. There was  
9 property damage, yes.

10 Q I take it that damage was not  
11 sufficient to qualify for state or federal  
12 funds?

13 A That is correct.

14 Q You testified that someone you knew  
15 from the Red Cross had participated in a  
16 public safety message on WTVE. Do you recall  
17 that?

18 A Yes.

19 Q What was nature of those messages?  
20 Do you recall?

21 A I don't remember. My contact was  
22 Adrian Grieve. I remember him telling me he

1 was going there and doing a couple of short  
2 programs. I don't how long, short programs  
3 about safety.

4 Q Do you think that was in the '89  
5 to '94 period of time?

6 A As I said, I can't honestly say. I  
7 believe it was. I you recall the '94 -- I  
8 remember it was the same timeframe I was  
9 contacted. I don't remember '94 or '96. I  
10 am leaning toward '96.

11 Q Do you have any awareness of any  
12 other organizations or agencies that were  
13 participating in similar messages with WTVE?

14 A No. I am aware of the Red Cross  
15 because we have a close working relationship.

16 I am not aware if any others were  
17 involved.

18 Q You don't recall watching WTVE  
19 during the period?

20 A Correct.

21 MR. HUTTON: I have nothing  
22 further.

1 MR. COLE: Please spell the name  
2 Adrian something.

3 THE WITNESS: A-d-r-i-a-n  
4 G-r-i-e-v-e.

5 MR. COLE: Thank you. I have  
6 nothing further. That takes care of it. I  
7 hope we have not disrupted your operation.

8 THE WITNESS: No, I apologize for  
9 the interruptions.

10 (Whereupon, at 10:10 a.m., the  
11 deposition of JOHN LOOS was  
12 adjourned.)

13 \* \* \* \* \*

14 (Signature waived)

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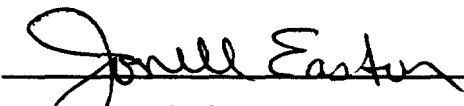
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**CERTIFICATE OF NOTARY PUBLIC**

**DISTRICT OF COLUMBIA**

I, JONELL EASTON, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn; that the foregoing transcript is true and accurate record of the testimony given by said witness.

I further certify that I am not related to any of the parties to this action by blood or marriage and I am in no way interested in the outcome of this matter.

  
My Commission Expires:

March 31, 2004